

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

CASE NO.: 5:09-CR-216-8FL

UNITED STATES OF AMERICA)
)
 vs.)
)
 ZIYAD YAGHI,)
)
 Defendant.)

MOTION FOR EXTENSIONS OF TIME
TO MAKE PRELIMINARY AND FINAL
DESIGNATIONS OF FOREIGN DEPOSITIONS

COMES NOW the Defendant, by and through his undersigned counsel, and hereby moves the Court for extensions of time to make preliminary designations of any foreign depositions he intends to take, and to make final designations and file necessary motions related to such depositions. In support of this Motion, Defendant show unto the Court as follows:

1. Pursuant to the Order [315] filed April 27, 2010 Defendants have until May 23, 2010 to make preliminary designations of any foreign depositions they intend to take.
2. Pursuant to the Order [315] filed April 27, 2010, Defendants have until June 7, 2010 to make final designations of any foreign depositions they intend to take, and to file necessary motions related to such depositions.
3. Defendant's counsel has not had adequate time to make decisions regarding the foreign depositions he intends to take because of the voluminous discovery being undertaken thus far.
4. Defendant's counsel needs an additional thirty (30) days within which to make preliminary designations of any foreign depositions he intends to take, and to make final designations and file necessary motions related to such depositions.

5. The Government's counsel has been consulted, and does not object to the extensions.

WHEREFORE, Defendant Ziyad Yaghi prays unto the Court:

1. That extensions of time be granted, (1) from May 23, 2010 to June 22, 2010, to make preliminary designations of any foreign depositions he intends to take, and (2) from June 7, 2010 to July 6, 2010, to make final designations and file necessary motions related to such depositions.

2. That he have such other and further relief as the Court may deem just and proper.

This 20th day of May, 2010.

s/J. Douglas McCullough
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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that he has this day served a copy of the foregoing pleading upon the following parties to this case by depositing a copy of the same in the United States mail bearing sufficient postage or electronically as indicated:

Via CM/ECF to the following:

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This 20th day of May, 2010.

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